

**EXHIBIT B**

**FILED UNDER SEAL**

## ATTORNEYS' EYES ONLY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

5 WAYMO LLC, )  
6 Plaintiff, )  
7 vs. ) Case No.:  
8 UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
9 OTTOMOTTO LLC; OTTO TRUCKING )  
LLC, )  
10 Defendants. )

ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF JAMES HASLIM  
San Francisco, California  
Tuesday, April 18, 2017  
Volume 1

23      Reported by:  
24      RACHEL FERRIER, CSR No. 6948  
25      Job No. 2597892  
25      PAGES 1 - 112

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1	MR. KIM: Objection; form.	10:41:07
2	THE WITNESS: That's my understanding.	10:41:08
3	BY MR. JAFFE:	10:41:09
4	Q Okay. How much are the diodes [REDACTED]	10:41:14
5	[REDACTED]	10:41:17
6	A I'm not sure I know the number.	10:41:18
7	Q Is it a [REDACTED]	10:41:22
8	A I wouldn't be surprised if it was [REDACTED]	10:41:23
9	[REDACTED].	10:41:26
10	Q Okay. And to go back to my earlier question, the	10:41:27
11	Fuji design, in total, has [REDACTED]	10:41:34
12	[REDACTED]; right?	10:41:37
13	MR. KIM: Objection; form.	10:41:39
14	THE WITNESS: That is the current design.	10:41:40
15	BY MR. JAFFE:	10:41:48
16	Q Okay. How are the diodes aligned with respect	10:41:49
17	to -- for manufacturing purposes with respect to each	10:41:54
18	other?	10:42:00
19	MR. KIM: Objection; form.	10:42:01
20	THE WITNESS: [REDACTED]	10:42:02
21	[REDACTED]	10:42:07
22	[REDACTED]	10:42:11
23	BY MR. JAFFE:	10:42:14
24	Q And there's a -- you provide an X/Y coordinates	10:42:15
25	to the manufacturer; right, for each of the laser	10:42:18

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1	diodes?	10:42:20
2	A Yes.	10:42:21
3	Q And what are the X/Y coordinates mapped to?	10:42:21
4	A They are referenced to fiducial marks on the PCB.	10:42:25
5	Q And have you ever used holes for those?	10:42:30
6	A Sorry?	10:42:35
7	Q For the fiducials, have you ever used a hole as a fiducial?	10:42:36
8		10:42:42
9	A No. We have always placed the laser diodes using the metal fiducial marks on the PCB.	10:42:43
10		10:42:46
11	Q And who came up with that idea?	10:42:48
12	MR. KIM: Objection; form.	10:42:50
13	THE WITNESS: I believe it's standard practice in	10:42:51
14	PCB manufacture.	10:42:54
15	BY MR. JAFFE:	10:42:56
16	Q So who came up with using it for Fuji?	10:42:56
17	A I don't know.	10:42:58
18	Q Okay. When did that design come up?	10:42:59
19	A I don't remember the exact date, but I think you suggested there was a certain time frame. Did you say	10:43:03
20		10:43:09
21	December when boards went out? It would be in that	10:43:11
22		10:43:17
23	Q Well, just to be clear, I'm looking to your	10:43:17
24	testimony about this --	10:43:20
25	A I understand.	10:43:20

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1 there? 11:16:19

2 A Oh, if I had him face-to-face, I would have 11:16:19

3 recounted the sequence of events and -- [REDACTED] 11:16:21

4 [REDACTED] 11:16:24

5 Q And what transpired? 11:16:27

6 A Oh, it would help to go back, but, basically, I'm 11:16:29

7 announcing to my team that we are making a major pivot 11:16:35

8 in our design approach. [REDACTED] 11:16:39

9 [REDACTED] 11:16:43

10 [REDACTED] 11:16:47

11 [REDACTED] 11:16:50

12 Q And what happened? 11:16:51

13 A [REDACTED] 11:16:51

14 [REDACTED] 11:17:01

15 [REDACTED] 11:17:05

16 [REDACTED] 11:17:12

17 [REDACTED] 11:17:15

18 [REDACTED] 11:17:16

19 [REDACTED] [REDACTED] 11:17:19

20 [REDACTED] 11:17:23

21 [REDACTED] 11:17:26

22 Q [REDACTED] 11:17:27

23 [REDACTED] 11:17:29

24 A Yes. 11:17:31

25 Q And then did you tell him, "We are not doing 11:17:32